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Attorneys for Defendants The United States Chess Federation,
Joel Channing, William Goichberg, Bill Hall, Herbert Rodney Vaughn,
Gregory Alexander, Grant Perks, Randall Hough, Randy Bauer, Paul Truong,
Susan Polgar and Jim Berry

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SAM SLOAN,		:
	Plaintiff,	:
		:
		:
		:
vs.		:
		:
HOAINHAN “PAUL” TRUONG, ZSUZSANNA		:
“SUSAN” POLGAR, JOEL CHANNING,		:
WILLIAM GOICHBERG, THE UNITED STATES		:
CHESS FEDERATION, BILL HALL, HERBERT		:
RODNEY VAUGHN, GREGORY ALEXANDER,		:
FRANK NIRO, GRANT PERKS, WILLIAM		:
BROCK, RANDALL HOUGH, RANDY BAUER,		:
JIM BERRY, TEXAS TECH UNIVERSITY and		:
UNITED STATES OF AMERICA,		:
		:
	Defendants.	:
		:
		:
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	Civil Action No. 07-CV-8537 (DC)
	NOTICE OF MOTION TO DISMISS
	PLAINTIFF’S COMPLAINT
	PURSUANT TO FEDERAL RULES OF
	CIVIL PROCEDURE 12(b)(1) AND
	<u>12(b)(2)</u>
	Document Filed Electronically

PLEASE TAKE NOTICE that on a date and time to be designated by the Court, the undersigned attorneys for defendants The United States Chess Federation, Joel Channing, William Goichberg, Bill Hall, Herbert Rodney Vaughn, Gregory Alexander, Grant Perks, Randall Hough, Randy Bauer, Paul Truong, Susan Polgar and Jim Berry (“Defendants”) will move this Court, before the United States District Court, Southern District of New York, the

Honorable Denny Chin, U.S.D.J., at the United States Courthouse, 500 Pearl Street, New York, New York 10007 for an Order granting dismissal of Plaintiff's Complaint in its entirety pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(2), with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendants will rely on the annexed Memorandum of Law, Affidavit of Jeremy M. Brown, Esq., with exhibit, and the Affidavit of William Goichberg filed and served simultaneously herewith.

Dated: January 4, 2008

PROSKAUER ROSE LLP

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